

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	Criminal No. 23cr10255
)	
v.)	Violation:
)	
MICHAEL VAN RADER,)	<u>Count One</u> : Possession with Intent to Distribute
)	Cocaine Within 1000 Feet of a Public Housing
Defendant)	Facility
)	(21 U.S.C. §§ 841(a)(1) and 860(a))
)	
)	<u>Forfeiture Allegation</u> :
)	(21 U.S.C. § 853)
)	

INDICTMENT

COUNT ONE

Possession with Intent to Distribute Cocaine Within 1000 Feet of a Public Housing Facility
(21 U.S.C. §§ 841(a)(1) and 860(a))

The Grand Jury charges:

On or about September 3, 2023, in Boston, in the District of Massachusetts, the defendant,

MICHAEL VAN RADER,

did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

The Grand Jury further alleges that the offense described herein was committed by the defendant in, on, and within one thousand feet of the real property comprising a housing facility owned by a public housing authority, to wit, the Mildred C. Hailey Apartments in Boston, Massachusetts.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

DRUG FORFEITURE ALLEGATION
(21 U.S.C. § 853)

The Grand Jury further finds:

1. Upon conviction of the offense in violation of Title 21, United States Code, Section 841(a)(1), set forth in Count One, the defendant,

MICHAEL VAN RADER,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant -

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- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL


FOREPERSON


SARAH HOEFLE
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: September 20, 2023
Returned into the District Court by the Grand Jurors and filed.

/s/Thomas F. Quinn 9/20/2023 @ 1:00pm
DEPUTY CLERK